

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)
)
)
) No. 3:22-cr-2381
v.) JUDGE FRENSLEY
)
) FILED UNDER SEAL
NATHANIEL MCDONALD)

MOTION TO CONTINUE DETENTION AND PRELIMINARY HEARINGS

Nathaniel McDonald, through counsel, respectfully moves for a continuance of the detention and preliminary hearings scheduled for Friday, December 30, 2022 at 1:00 p.m. As grounds, undersigned counsel would state that she is currently ill and unavailable to attend any detention or preliminary hearing at this time. Additionally, more time is required to prepare for the detention and preliminary hearings.

Defense counsel also requests that the parties address all detention issues as well as the preliminary hearing issues at any rescheduled hearing. Counsel requests that if possible, the hearing be held in the courtroom rather than by video conference.

Respectfully submitted,

/s/ Caryll S. Alpert
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Attorney for Nathaniel McDonald

CERTIFICATE OF SERVICE

I hereby certify that on December 29, 2022, I electronically filed the foregoing *Motion to Continue Detention and Preliminary Hearings* with the clerk of the court by using the CM/ECF system, which will send a Notice of Electronic Filing to the following: Joshua A. Kurtzman, Assistant United States Attorney, 719 Church Street, Suite 3300, Nashville, TN 37203.

/s/ Caryll S. Alpert
CARYLL S. ALPERT